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## BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

## MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

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## AMERICAN POSTAL WORKERS UNION, AFL-CIO, SECOND NOTICE OF OUTSTANDING DISCOVERY AND MOTION TO KEEP RECORD OPEN (July 2, 2012)

The American Postal Workers Union, AFL-CIO (APWU) provides this notice detailing the discovery directed to the Postal Service and Postal Service witnesses for which responses are still outstanding. This filing is meant to encompass discovery propounded by all participants, exclusive of information requests from the Presiding Officer.

According to our review of the docket in this case, the following interrogatories remain outstanding as of the time of this filing:

## Institutional

- APWU/USPS-38 (filed April 6, 20120)
- DBP/USPS-23 (filed December 28, 2011)
- GCA/USPS-6 (filed December 30, 2011)

Presiding Officer's Ruling No. N2012-1/69 issued June 26, 2012, established July 3, 2012, as the expected date the evidentiary record in this docket will close. In light of the Postal Service filing of discovery responses today and those responses that remain outstanding, APWU respectfully requests that the Commission permit time for the parties to designate any additional responses before closing the record in this proceeding.

Respectfully submitted,

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